

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CERENCE OPERATING COMPANY,	§	Case No. 2:23-cv-00482-JRG-RSP
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	
SAMSUNG ELECTRONICS CO., LTD.	§	
and SAMSUNG ELECTRONICS	§	
AMERICA, INC.	§	
	§	
<i>Defendants.</i>	§	

**DEFENDANTS' UNOPPOSED MOTION
FOR LEAVE TO AMEND ITS P.R. 4-1 DISCLOSURE AND TO EXTEND THE
DEADLINE FOR EXCHANGING P.R. 4-2 DISCLOSURES OF PRELIMINARY CLAIM
CONSTRUCTIONS AND EXTRINSIC EVIDENCE**

Pursuant to P.R. 4-1(b), Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Defendants” or “Samsung”) respectfully move the Court (1) for leave to amend their proposed P.R. 4-1 Disclosure of terms and claim elements for construction (previously served on October 18, 2024), and (2) to extend to November 12, 2024, the deadline for the parties to exchange their P.R. 4-2 Disclosures of preliminary claim constructions and extrinsic evidence .

Following service of its original P.R. 4-1 disclosure on October 18, 2024, Samsung identified additional terms for disclosure under P.R. 4-1. Relatedly, Samsung requested a brief extension to November 12, 2024, for the P.R. 4-2 disclosures. The parties met and conferred by email regarding additional disclosures under P.R. 4-1 and extending the P.R. 4-2 deadline by four days. Plaintiff agreed and does not oppose the relief sought herein. The extension requested herein will not impact any other deadlines in this case.

Samsung respectfully requests that this Court grant this Unopposed Motion for Leave to Amend its P.R. 4-1 Disclosure and to Extend the Deadline for Exchanging P.R. 4-2 Disclosures of Preliminary Claim Constructions and Extrinsic Evidence to November 12, 2024.

DATED: November 8, 2024

Respectfully submitted:

/s/ Melissa R. Smith

Melissa R. Smith
Texas Bar No. 24001351
melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Darin W. Snyder
dsnyder@omm.com
Luann L. Simmons
lsimmons@omm.com
Mark Liang (Pro Hac Vice)
mliang@omm.com
Bill Trac
btrac@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111
Telephone: 415 984-8700
Facsimile: 415-984-8701

Hyun Min Han (*Pro Hac Vice*)
kelvinhan@omm.com
O'MELVENY & MYERS LLP
400 S. Hope Street, 17th Floor
Los Angeles, CA 90071
Telephone: 213-430-6000
Facsimile: 213-430-6407

Jin-Suk Park (*Pro Hac Vice*)
jin.park@arnoldporter.com
Ali Sharifahmadian (*Pro Hac Vice*)
ali.sharifahmadian@arnoldporter.com
**ARNOLD & PORTER KAYE SCHOLER
LLP**

601 Massachusetts Ave., NW
Washington, DC 20001-3743
Telephone: (202) 942-5000
Facsimile: (202) 942-5555

Patrick C. Reidy (Pro Hac Vice)
patrick.reidy@arnoldporter.com
Raj Patel
raj.patel@arnoldporter.com (Pro Hac Vice)
**ARNOLD & PORTER KAYE SCHOLER
LLP**
70 West Madison Street, Suite 4200
Chicago, IL 60602-4231
312-583-2424
Fax: 312-583-2360

Ryan M. Nishimoto (Pro Hac Vice)
ryan.nishimoto@arnoldporter.com
Daniel S. Shimell
daniel.shimell@arnoldporter.com (Pro Hac
Vice)
**ARNOLD & PORTER KAYE SCHOLER
LLP**
777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017
Telephone: (213) 243-4000
Facsimile: (213) 243-4199

*Attorneys for Samsung Electronics Co., Ltd.
and Samsung Electronics America, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was filed electronically in compliance with Local Rules CV-5(a) on November 8, 2024. As such, this document was served on all counsel of record pursuant to Local Rules CV-5(a)(3)(A) and the Federal Rules of Civil Procedure.

/s/ Melissa R. Smith

Melissa R. Smith

CERTIFICATE OF CONFERENCE

I hereby certify that on October 31, 2024, and November 4, 2024, counsel for Defendants conferred with counsel for the Plaintiff regarding this motion via email in compliance with Local Rules CV-7(h) and CV-7(i). Plaintiff does not oppose the motion.

/s/ Patrick Reidy

Patrick Reidy